

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on)	
behalf of all other similarly situated,)	
)	
Plaintiff,)	Case No. 1:22-cv-06918
)	
v.)	Hon. Franklin U. Valderrama
)	
BELKIN INTERNATIONAL, INC.,)	Magistrate Judge Gabriel A. Fuentes
)	
Defendant.)	

UNOPPOSED MOTION FOR ENTRY OF PROTECTIVE ORDER
PERMITTING ATTORNEYS'-EYES-ONLY DESIGNATION

Defendant Belkin International, Inc. (“Belkin”), by and through its undersigned counsel and pursuant to Fed. R. Civ. P. 26(c) and 45(c) and the Court’s prior orders (Dkt. Nos. 56 and 85), hereby moves this Court to enter an amended confidentiality order, as previously directed by the Court. Belkin has met and conferred with Plaintiff and Plaintiff does not oppose the relief requested herein.

In response to Belkin’s objection that certain information sought in discovery by Plaintiff constituted “sensitive, proprietary or confidential business information or trade secrets” (Dkt. 51 at 7), the Court found that Belkin “raise[d] a valid concern as the competitive sensitivity associated with this data.” (Dkt. 56 at 8, fn 2.) Accordingly, the Court directed that:

any sales- or pricing-related documents produced in compliance with this order are hereby directed to be treated as “attorneys’-eyes-only,” with the parties conferring further as to the scope and contours of that provision, but with the Court’s intent being to shield the information from the eyes of persons from Defendant’s competitors by limiting review only to attorneys and to experts as necessary, with experts executing a form of agreement that they will not share or use the information outside of the litigation. The competitive sensitivity of such data is not, as Defendant has contended, a reason to withhold it from production. (*Id.*)

Because Belkin had not at that time been able to review all of the documents and information that would potentially be produced, Belkin sought entry of an amended confidentiality order that would permit designating sales and pricing information, as well as other potentially competitively-sensitive information, “ATTORNEYS’ EYES ONLY-SUBJECT TO PROTECTIVE ORDER.” (Dkt. 86.) The Court denied that motion without prejudice to refiling “after further conferral” regarding the scope of the heightened designation. (Dkt. 95.)

Having now reviewed the documents and information at issue in discovery, Belkin does not seek an amended protective order beyond the scope of what the Court had previously ordered

with respect to sales and pricing information. Therefore, based upon further conferral, Belkin requests that the Court enter the order attached hereto as Exhibit A.

Dated: May 22, 2024

Respectfully submitted,

By: /s/ Laura Kelly

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